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April 25, 2024

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**VIA ECF AND FAX**

The Honorable Alvin K. Hellerstein  
U.S. District Judge for the Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007-1312

The initial pretrial conference scheduled for May 3, 2024 is adjourned until June 7, 2024 at 10 a.m. The deadline to submit a case management plan is enlarged to June 5, 2024 at 12 p.m.

SO ORDERED

/s/ Alvin K. Hellerstein  
U.S.D.J.  
April 25, 2024

**Re: *Bobcar Media, LLC v. Deutsche Telekom AG et al.*, 1:21-cv-05685-AKH-OTW**

Dear Judge Hellerstein:

We represent Defendant T-Mobile USA, Inc. in the above-captioned matter and submit this joint letter on behalf of both Defendants and Plaintiff. The parties respectfully request an extension of the upcoming May 1st date to submit a proposed case management plan and an adjournment of the May 3rd 10 a.m. date for the initial pretrial conference (Dkt. 86).

The parties jointly request an extension of these dates because the parties are still discussing the potential for early resolution of the case. In the event the parties are unable to resolve the matter, the parties will need to discuss next steps relating to the litigation, including the items in the case management plan and Defendants' intent to seek a potential stay of the case pending *ex parte* reexamination of the Patents-in-Suit by the USPTO. Particularly in view of more limited availability of counsel to this case at present in view of Passover and in order to provide for adequate time for the necessary meet-and-confers, an extension of the current dates will be helpful for the parties' discussions.

This is the parties' second request to continue the deadline to submit a proposed case management plan and for an adjournment of the initial pretrial conference. The Court granted the parties' previous request. There are no other previously scheduled dates. The parties request that both dates be extended by at least four weeks or otherwise at the Court's convenience.

We thank the Court in advance for its attention to this matter.

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Respectfully submitted,

*/s/ Martin E. Gilmore*

Martin E. Gilmore

Perkins Coie LLP

*Counsel for T-Mobile*

cc: Counsel of record via ECF